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6 7 8 9 10	S. ASHAR AHMED (SBN 256711) aahmed@nossaman.com 50 California Street, 34th Floor San Francisco, CA 94111 Telephone: 415.398.3600 Facsimile: 415.398.2438			
11 12	Attorneys for Plaintiffs and Counter-Defendants ICE Consulting, Inc.; Uzair Sattar; and Derick Needham			
13	[Additional Counsel on Signature Page]			
14 15 16 17	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION			
18 19 20 21 22	ICE CONSULTING, INC., UZAIR SATTAR, and DERICK NEEDHAM Plaintiffs and Counter-Defendants, vs. GAVIN JENSEN,	Case No: 3:16-cv-0434 STIPULATION TO C CASE MANAGEMEN CONFERENCE AND ON ICE CONSULTIN MOTION TO DISMIS [PROPOSED] ORDER Current Data of CMC:	CONTINUE NT HEARING NG, INC.'S SS AND R	
232425	Defendant and Counter- Claimant.	Current Date of CMC: Proposed New Date Of CMC:	Feb. 2, 2017	
25262728		Trial: Not Set		

Case No. 3:16-cv-04349-EMC

1	Pursuant to Local Rule 6-2, Plaintiffs and Counter-Defendants ICE		
2	Consulting, Inc. ("ICE"), Uzair Sattar, and Derick Needham (collectively,		
3	"Plaintiffs"), and Defendant and Counter-Claimant Gavin Jensen ("Defendant")		
4	Plaintiffs and Defendant are herein referred to collectively as the "Parties"), by		
5	and through their respective counsel, hereby enter into this Stipulation to Continue		
6	the Case Management Conference and Hearing on ICE's Motion to Dismiss. This		
7	Stipulation is based on the contents of this stipulation and the Declaration of		
8	Andrew C. Crane ("Crane Dec."), filed concurrently herewith.		
9	WHEREAS, on December 9, 2016, the Parties reached a settlement in		
10	principle. Crane Dec., ¶ 2.		
11	WHEREAS, on December 12, 2016, the Parties submitted a Notice of		
12	Conditional Settlement and Request to Stay Proceedings (Dkt. No. 97), informing		
13	the Court of the settlement in principle and requesting time to prepare and execute		
14	the settlement documents. Crane Dec., ¶ 3.		
15	WHEREAS, the Court entered an Order staying all proceedings, and		
16	resetting the hearing date for ICE's Motion to Dismiss Defendant's Second, Third,		
17	Fourth, and Fifth Counterclaims ("Motion to Dismiss") to January 12, 2017 at		
18	1:30 p.m. (Dkt. No. 99). Per this same order, the Court also reset the Case		
19	Management Conference from December 15, 2016, to January 12, 2017. Crane		
20	Dec., ¶ 3.		
21	WHEREAS, on January 4, 2017, counsel for the Parties received a request		
22	from the clerk of this Court regarding the status of the Parties' settlement. Crane		
23	Dec., ¶ 4.		
24	WHEREAS, on January 5, 2017, counsel for Plaintiffs explained that		
25	(1) due to the intervening holiday season and respective holiday travel on the part		
26	of the Parties and their respective counsel, the settlement agreement has not yet		
27	been finalized, although the Parties anticipate finalizing the terms of the settlement		
28			

1	agreement within a matter of days; and (2) the Parties intend to file a Joint Motion			
2	requesting the Court to retain jurisdiction to enforce the settlement agreement no			
3	later than January 12, 2017, followed by a Joint Request for Dismissal. Crane			
4	Dec., ¶ 4.			
5	WHEREAS, in response, the clerk of this Court suggested the Parties			
6	submit a stipulation continuing the hearing date on ICE's Motion to Dismiss to			
7	avoid the Court spending unnecessary time preparing for the Motion. Crane Dec.			
8	¶ 5.			
9	WHEREAS, the three week extension sought by this Stipulation will not			
10	affect any other dates currently calendared, because as of the filing of this			
11	Stipulation, there are no dates currently calendared beyond the hearing and Case			
12	Management Conference. Moreover, as set forth above, the Parties have settled			
13	this matter in principle and will be submitting filings with the Court regarding the			
14	settlement within a matter of days. Crane Dec., ¶ 6.			
15	THEREFORE, THE PARTIES	THEREFORE, THE PARTIES HEREBY STIPULATE:		
16	That the hearing on ICE's Motion to Dismiss and the Case Management			
17	Conference shall be continued from J.	Conference shall be continued from January 12, 2017, to February 3, 2017, at 1:30		
18	p.m.			
19	IT IS SO STIPULATED.	IT IS SO STIPULATED.		
20		NOCCAMAN	IIID	
21	Date: January 6, 2017	NOSSAMAN VERONICA	M. GRAY	
22		ANDREW C	. CRANE	
23		By: /s/ Andre	w C. Crane	
24		Andrev	w C. Crane	
25			Plaintiffs and Counter-	
26			ng, Inc.; Uzair Sattar;	
27		and Derick N	eedham	
28		- 2 -	Case No. 3:16-cv-04349-EMC	

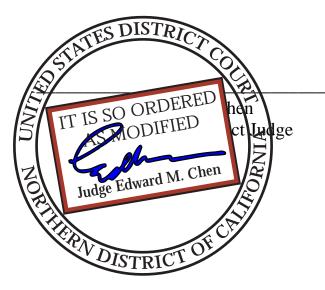
1	Date: January 6, 2017	DHILLON LAW GROUP INC			
2		By: /s/ Nitoj P. Singh			
3		Nitoj P. Singh			
4 5		Attorneys for Defendant and Counter-Claimant			
6		Gavin Jensen			
7	Additional Counsel:				
8	raditional Country.				
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13	San Francisco, California 94108				
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14	1 desimile. (413) 320 0373				
15	Attorneys for Defendant Gavin Jensen				
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		3 - Case No. 3:16-cv-04349-EMC AGEMENT CONFERENCE AND HEARING ON			

ORDER

PURSUANT TO THE STIPULATION AND GOOD CAUSE APPEARING,

IT IS SO ORDERED that the Motion to Dismiss and the Case Management

Conference be continued to February 3, 2017 at 1:30 P.M. in Department 5.



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Case No. 3:16-cv-04349-EMC